

FILED

JAN 30 2013

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) No.
)
 SANDRA E. FORD,)
)
 Defendant.)

4 : 13CR00038JAR

INDICTMENT

COUNT ONE

The Grand Jury charges that:

1. At all times relevant, SANDRA E. FORD ("FORD"), the defendant herein, lived in the Eastern District of Missouri.
2. At all times relevant, Saint Louis University was an education institution with its main campus in the City of St. Louis, within the Eastern District of Missouri. Saint Louis University maintains a recreation facility on its main campus that is commonly known as the Simon Recreation Center.
3. Between in or around July 1994, and continuing until in or around August 2012, FORD was employed by Saint Louis University. During at least 2011 and 2012, FORD worked as a financial coordinator for the Simon Recreation Center. In her position as a financial coordinator, FORD routinely had access to funds and payments that were paid to and belonged to Saint Louis University. For example, outside groups sometimes paid a fee to Saint Louis University for the use of the Simon Recreation Center to host camps and other activities.

4. At all times relevant, Saint Louis University maintained an American Express credit account, account no. xxxx xxxx xxxx 001 (sometimes referred to as a procurement card), for use in connection with certain expenses, including expenses associated with the Simon Recreation Center.

5. At all times relevant, as part of her employment duties at Saint Louis University, FORD had access to American Express account no. xxxx xxxx xxxx 001, which she was not permitted to use for personal expenses.

6. At all times relevant, Bank of America, NA ("Bank of America") was a federally insured financial institution with offices in the Eastern District of Missouri and elsewhere.

7. At all times relevant, FORD maintained a personal checking account at Bank of America with an account number of xxxx xxxx 9343 ("the '9343 account").

8. At all times relevant, FORD knew that she was not permitted to deposit funds and checks owned by and due to Saint Louis University into her personal checking account.

9. Beginning in or around January 2011, and continuing until in or around August 2012, in the Eastern District of Missouri and elsewhere,

SANDRA E. FORD,

the defendant herein, did knowingly devise and execute a scheme to defraud and to obtain moneys, funds, credits and properties by means of materially false and fraudulent pretenses, representations, and promises.

10. In general, the scheme operated as an embezzlement scheme in which FORD converted to her own use funds and checks owned by and due to Saint Louis University.

11. The scheme involved FORD taking checks made payable to Saint Louis University and fraudulently negotiating those checks into her personal checking account at Bank of America without lawful authority to do so. Typically, FORD would deposit the checks into her account using an ATM machine. In so doing, FORD falsely and fraudulently represented to Bank of America that she had the lawful authority to deposit such checks and use the resulting proceeds in her account.

12. On or about April 5, 2011, Gym Rats, LLC, of Indiana, wrote check number 4108, drawn on an account at Tower Bank, in the amount of \$3,734.00, and payable to Saint Louis University - Simon Rec Center. The memo line on the check indicated that the payment was for court rental.

13. As part of the scheme, on or about April 20, 2011, in the Eastern District of Missouri, FORD deposited and caused to be deposited, the above-referenced check number 4108 into her personal checking account at Bank of America, and in so doing falsely and fraudulently represented that she had lawful authority to deposit the check.

14. On or about July 22, 2011, Superskill Swim Camp, of Wildwood, MO, wrote check number 1300, drawn on an account at US Bank, in the amount of \$2,600.00, and payable to Saint Louis University.

15. As part of the scheme, on or about July 25, 2011, in the Eastern District of Missouri, FORD deposited and caused to be deposited, the above-referenced check number 1300 into her personal checking account at Bank of America, and in so doing falsely and fraudulently represented that she had lawful authority to deposit the check.

16. On or about November 14, 2011, St. Louis Volleyball Inc. provided to Saint Louis University PNC Bank cashier's check number 45617, in the amount of \$4,000, payable to Saint Louis University.

17. As part of the scheme, on or about November 14, 2011, in the Eastern District of Missouri, FORD deposited and caused to be deposited, the above-referenced cashier's check number 45617 into her personal checking account at Bank of America, and in so doing falsely and fraudulently represented that she had lawful authority to deposit the cashier's check.

18. On or about July 20, 2012, Superskill Swim Camp, of Wildwood, MO, wrote check number 1136, drawn on an account at US Bank, in the amount of \$2,600.00, and payable to Saint Louis University.

19. As part of the scheme, on or about July 20, 2012, in the Eastern District of Missouri, FORD deposited and caused to be deposited, the above-referenced check number 1136 into her personal checking account at Bank of America, and in so doing falsely and fraudulently represented that she had lawful authority to deposit the check.

20. As part of the scheme, on or about August 2, 2012, in an effort to cover up her fraud FORD falsely and fraudulently advised a director of business at Saint Louis University that Ford had accidentally deposited check number 1136 into Ford's personal checking account. FORD falsely and fraudulently advised the director of business that she had not taken any other money. FORD did not advise the director of business that she had previously deposited numerous checks into her personal bank account without lawful authority and thereafter used those funds.

21. On or about July 20, 2012, in the Eastern District of Missouri,

SANDRA E. FORD,

the defendant herein, did knowingly execute and attempt to execute a scheme and artifice to defraud Bank of America, a federally insured financial institution, and to obtain and attempt to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of Bank of America by means of materially false and fraudulent pretenses, representations, and promises, to wit, by presenting for deposit into Bank of America account no. '9343 check number 1136, drawn on the account of Superskill Swim Camp, in the amount of \$2,600.00, payable to Saint Louis University.

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT TWO

The Grand Jury further alleges:

1. The Grand Jury realleges and incorporates by reference paragraphs 1 through 11 of Count One.
2. Between in or around January 2011, and continuing until in or around March 2012, FORD fraudulently and without authorization used American Express account no. xxxx xxxx xxxx 001 to make personal purchases, including purchases of goods and services related to her involvement with a church in the Eastern District of Missouri.
3. On or about February 7, 2011, FORD used American Express account no. xxxx xxxx xxxx 001 without authority to purchase t-shirts for a church event at a cost of approximately \$717.41.
4. On or about August 12, 2011, FORD used American Express account no. xxxx xxxx xxxx 001 without authority to purchase Polo-style shirts with a church-related embroidery pattern on it, at a cost of approximately \$1,023.36.

5. Between on or about January 4, 2011, through approximately March 16, 2012, FORD made more than \$6,000.00 in fraudulent and unauthorized charges using Saint Louis University's American Express account no. xxxx xxxx xxxx 001.

6. On or about August 12, 2011, within the Eastern District of Missouri,

SANDRA E. FORD,

the defendant herein, did knowingly and with intent to defraud use an access device issued to another to effect transactions with said access device, namely American Express account number xxxx xxxx xxxx 001, to receive goods and services during a one-year period having an aggregate value that was equal to or greater than \$1,000.00, said conduct affecting interstate commerce; to wit, the defendant used American Express account number xxxx xxxx xxxx 001 to purchase and cause to be purchased custom embroidered "polo shirts" for a church at a cost of approximately \$1,023.36.

In violation of Title 18, United States Code, Sections 1029(a)(5) and 2.

A TRUE BILL.

FOREPERSON

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United States Attorney

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